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SC Court of Appeals

IN THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM RICHLAND COUNTY
Court of Common Pleas

Judge L. Casey Manning, Fifth Judicial Circuit

Appellate Case No. 2016—001239

Biafra Monique Curtis.....Appellant

v.

South Carolina Department of Public Safety, Warren Ganjehsani, Mike Oliver, Leroy Smith, Kenneth Phelps, Anthony Grice, William Taylor, Nicklous King, Willie McCauley, Jr. Ada Schmidt, Aaron Canzater and Cherie young, individually and in their Official Capacities.....Respondents

OBJECTION TO THE December 22, 2016 Filing of Appellant, Biafra Curtis, identified as "Appellants Final Reply Brief" and MOTION TO COMPEL APPELLANT TO CONFORM TO RULE 211(b)

YOU WILL PLEASE TAKE NOTICE, RESPONDENTS, by and through their undersigned attorney, hereby file a formal objection to the "final reply brief" of Appellant, filed with the Court December 22, 2016, and request the Court issue its Order compelling Appellant to conform her final briefing to Rule 211(b), SCACR.

The initial brief of Appellant contained seven and one-half pages of content. The initial reply brief of Appellant contained eight pages of content. The December 22, 2016 brief contains twenty-three pages of content, and obviously fails to comply

with Rule 211(b). Further, it is unclear if this final briefing is intended as an initial brief or a responsive brief, though the blue cover indicates it is intended as an initial brief, pursuant to Rule 267(e), SCACR.

Respondents, by and through the undersigned, would additionally crave reference to the Motion of Respondents to Reform the Record on Appeal, filed with the Court of Appeals on November 28, 2016. Therein, Respondents previously requested a temporary stay with regard to the filing of final briefs, given the pending Motion to Reform the Record on Appeal. Respondents further ask the Court to consolidate any scheduling Orders in this matter, with regard to this motion and the November 28, 2016 motion, in the Court's discretion, to provide the parties with a clear time line to comply with the filing and serving of the Record on Appeal and final briefs in this matter.

December 29, 2016

Respectfully submitted,

By: 

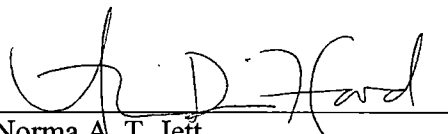
Norma A. T. Jett
Alison Dennis Hood
NESS & JETT, LLC
P.O. Box 909
Bamberg, South Carolina 29003
Telephone (803) 245-5178
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ATTORNEYS FOR ALL RESPONDENTS

CERTIFICATE OF SERVICE

This is to certify that I, Alison Dennis Hood, Attorney for ALL RESPONDENTS, along with Norma A. T. Jett of Ness & Jett, LLC, have this date mailed via the U.S. Postal Service with first class postage prepaid, a true and correct copy of the within **OBJECTION AND MOTION TO CONFORM FINAL BRIEF OF APPELLANT** in the matter captioned *Biafra Monique Curtis, Pro Se v. SCDPS, et al.*, Appellate Case Number: 2016-001239 to the following parties, at the following addresses:

Biafra Monique Curtis
P.O. Box 21294
Hilton Head, SC 29925

Bamberg, S.C.
12/29, 2016



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Attorneys for All Respondents

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ALISON DENNIS HOOD
ADAM C. NESS
R. AARON NESS

JULIUS B. NESS
1916-1991

December 28⁹, 2016

Honorable Jenny Abbott Kitchings, Clerk
South Carolina Court of Appeals
Post Office Box 11629
Columbia, SC 29211

Re: *Biafra Monique Curtis v. SCDPS, et al.*
Appellate Case Number: 2016-001239

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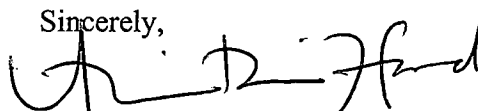
Dear Ms. Kitchings:

Please find enclosed an original and six copies, as well as a check for the filing fee, for **Respondents' Objection and Motion to Compel Confirmation to Rule 211(b)**.

By copy of this letter, I am serving a copy of these items on Appellant as shown below. Please file the original and return a clocked copy to me in the enclosed envelope.

Thank you for your assistance.

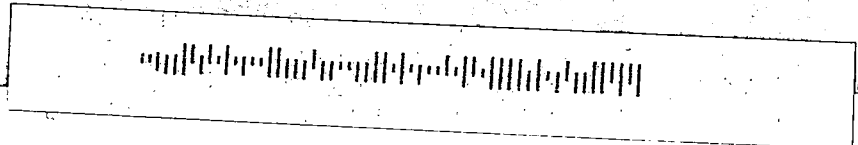
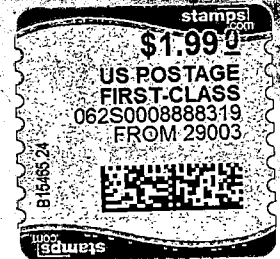
Sincerely,



Alison Dennis Hood

ADH
Enclosures

cc: Biafra Monique Curtis
Appellant
PO Box 21294
Hilton Head Island, SC 29925



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PO Box 909
Bamberg, SC 29003

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